

Anderson University Comments on  
REPORT ON BROADCAST LOCALISM AND NOTICE OF PROPOSED RULEMAKING

April 28, 2008

Introduction

Anderson University, Inc., as licensee of WQME-FM in Anderson Indiana, is pleased to have this opportunity to submit comments in response to this notice of proposed rulemaking. Anderson University is licensee of only one broadcast facility (WQME-FM) and by virtue of the fact that Anderson University is located in Anderson, Indiana, is truly a local owner and operator.

Anderson University shares the Commission's concerns about localism from both a public interest perspective and from a commercial perspective. We believe local radio is good for the community and for the license. However, we are highly concerned both about the costs of proposed additional requirements demonstrating localism and the effectiveness of such requirements. In addition, several other issues examined in this notice increase our concern.

Our staff consists of 4 full time professional employees, several part time professionals and a number of university students seeking experience in radio broadcasting. Because of the high turnover of the student staff and the challenge of educating novice freshmen each year, our energies are fully tapped and we would be challenged to financially handle additional requirements.

Our comments are organized by topic below.

Community advisory boards; Ad hoc listener surveys; "Town Hall" meetings

Despite our staff limitations, we survey the community well. We provide a monthly forum for both the city mayor and the county Chamber of Commerce on "The Morning Show with Matt Rust", as well as providing appearance opportunities for local not for profits on this program 2-4 times per week. Not only do these programs inform listeners, they also allow our staff to ascertain the needs of the community in an informal manner which is both effective and inexpensive. If the Commission were to require formal procedures, our staff would need to shift its focus to fulfill this, or we would be forced to increase staff with an accompanying increase in expenses. While it is certainly possible that we might become more aware of local issues and challenges, given the facts of the daily presence of both our ownership and our employees and their current high level of involvement in the community, this seems unlikely. All of our full time staff are heavily involved in community affairs. This is clearly demonstrated by our annual involvement not only in air time but personally in the following not for profit causes:

- Festival of Trees-Paramount Theatre
- Community Hospital Anderson – Coats of Caring
- Bears for Badges / Star Financial Bank

- Oktoberfest – Anderson Fine Arts Center benefit
- Red Gold Cooking School – benefit for Madison County 4-H
- We Can Care – city of Anderson Food Drive / Second Harvest of Central Indiana
- United Way events
- Homeward Bound Walk
- Dove Harbour – Women's Alternative Shelter in Anderson
- Christian Center Rescue Ministries in Anderson
- Special Olympics of Madison County
- Bids for Kids – Exchange Club Auction – prevention of child abuse in Madison County
- Countryside Animal Rescue
- Anderson YMCA – Strawberry Festival
- Mounds State Park
- Relay for Life – Cancer Society of Anderson/Madison County
- Madison County Sheriff Chaplaincy Ministry
- Cornelia De Lange Syndrome Walk – Lapel
- Operation Love Ministries
- Triple L Ranch in Anderson
- Health and Wellness Fair – Madison Park Church of God
- Character Counts of Madison County
- Anderson Soapbox Derby
- MOPS (Mothers of Preschoolers)
- Operation Christmas Child
- Toys for Tots
- Indiana Blood Center (Anderson/Madison County)

#### Remote station operation/Voice-tracking

WQME currently operates from 6 AM to Midnight Sunday through Thursday and from 6 AM to 2 AM Saturday and Sunday mornings. Currently, during all of these times, despite our ability to voice-track, a live announcer/transmitter operator is on duty. By April 1 of 2008, we expect to voice-track mid-days so that our full time Creative Services Director can devote more of her time to production and copywriting. In addition, we expect by that date to go to 24 hours with the overnight portions voice-tracked. Regardless, all of our voice-tracking is done by our staff and not done elsewhere, both because of our strong local presence and the fact that we desire to provide students with a strong experience. Regulations restricting voice-tracking could very well inadvertently interfere with both the quality of our programming and our ability to serve the local community. Listeners have repeatedly requested 24 hour operation and it will likely never be possible for us to do this without voice-tracking and remote station operation.

## Conclusion

While Anderson University wholeheartedly supports the notion of local broadcasting and local ownership, we believe that the requirements proposed are excessive, unwarranted in our situation, will potentially have a negative impact upon the local community, and require an expenditure of energy and financial resources which would be difficult for us to handle. We urge the Commission to carefully evaluate the necessity and cost of these additional regulations and to ensure that smaller, locally owned and operated radio stations are not unduly burdened.